

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN

LISA PURTUE,

Plaintiff,

v.

Case No. 18CV204

STATE OF WISCONSIN DEPARTMENT
OF CORRECTIONS, SHAWNA UECKER,
CHERYL EPLETT, WILLIAM POLLARD,
JIM SCHWOCHERT, MARC CLEMENTS,
KELLI BROWN, KARI BEIER, TONJA
HESSELBERG, WINN COLLINS, MAKDA
FESSAHAYE, AND CATHY JESS,

Defendants.

DECLARATION OF KARI BEIER

I, **KARI BEIER**, declare pursuant to 28 U.S.C. § 1746 and under the penalty of perjury, that the following is true and correct.

1. I make this declaration based upon my personal knowledge and my review of the regularly maintained business records in possession of the Wisconsin Department of Corrections (Corrections).

2. I am currently employed by the Wisconsin Department of Administration, Division of Personnel Management and am the Executive Human Resources Manager for Region 2, Department of Corrections. In this role I serve as the Director for the Bureau of Human Resources (BHR). I have held the position of BHR Director since September 11, 2011.

3. As the BHR Director, I am responsible for the human resources functions at the Department of Corrections to include: policy setting, recruitment and staffing, classification and compensation, employment relations, affirmative action/equal opportunity, FMLA management and payroll and benefits.

4. In my position, I have access to the personnel records of former Corrections' employees.

5. Lisa Purtue was employed by Corrections from October 7, 2013 to May 13, 2016. She was an officer at Dodge Correctional Institution (Dodge) from December 15, 2013 until her termination.

6. Attached and marked as **Exhibit 501** is a true and correct copy of Ms. Purtue's Appointment Letter.

7. On October 7, 2013, Purtue signed an Employee Statement of Acknowledgement for Executive Directives ("ED") #2 and #43, Employee Discipline and Work Rules. Attached and marked as **Exhibit 502** is a true and correct copy of Purtue's signed Employee Statement of Acknowledgment.

8. Attached and marked as **Exhibit 503** is a true and correct copy of Ms. Purtue's position description.

9. Attached and marked as **Exhibit 504** is a true and correct copy of Ms. Purtue's performance evaluations.

10. Attached and marked as **Exhibit 505** is a true and correct copy of the "Disciplinary Action Routing Slip" that Dodge's HR Director prepared and forwarded for approval of terminating Ms. Purtue's employment.

11. The decision to terminate a permanent employee is reviewed by the Management Advisory Team (MAT.) The MAT involves the BHR Director as well as staff from Employment Relations, Office of Diversity and Employee Services (ODES), and Office of Legal Counsel (OLC). I attended the MAT meeting on May 12, 2016 that involved a discussion of Purtue.

12. I received a copy of the investigation summary and comparators prepared by Employment Relations. During the MAT meeting, there was a discussion of the facts, comparators, and recommendation. The MAT can agree or disagree with the recommendation. I have been in many meetings where the MAT will either recommend an escalation or determine that the recommendation is excessive.

13. Terminations also need to be reviewed and approved by the BHR Director. I attended the May 12, 2016 meeting and supported terminating Purtue's employment for lying and falsifying documents, which resulted in an inmate being referred to law enforcement for no reason.

14. I signed-off on the decision to terminate Ms. Purtue in my role as a member of the MAT team and as BHR Director. My decision was not based on her gender.

15. Attached and marked as **Exhibit 506** is a true and correct copy of Ms. Purtue's termination letter.

16. Attached and marked as **Exhibit 508** is a true and correct copy of the October 2015 DOC-1271A Employee Investigation packet for Mr. Purtue.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 15, 2019.

s/ Kari Beier
Kari Beier